INITIAL STUDY

PROJECT TITLE: Rho-Chem LLC Permit Renewal		CALSTARS CODING:
PROJECT ADDRESS: 425 Isis Avenue	CITY: Inglewood	COUNTY: Los Angeles
PROJECT SPONSOR: Rho-Chem Co., a subsidiary of Philip Services Company	CONTACT: Pramod Tendulkar	PHONE: (323) 776-6233

APPROVAL ACTION UNDER CONSIDERATION BY DTSC:
☐ Initial Permit Issuance ☒ Permit Renewal ☐ Permit Modification ☐ Closure Plan
☐ Removal Action Workplan ☐ Remedial Action Plan ☐ Interim Removal ☐ Regulations
☐ Other (specify):

STATUTORY AUTHORITY:
☒ California H&SC, Chap. 6.5 ☐ California H&SC, Chap. 6.8 ☐ Other (specify):

DTSC PROGRAM/ ADDRESS: HWMP/ PRT 9211 Oakdale Ave. Chatsworth, CA 91311	CONTACT: Liang Chiang	PHONE: (818) 717-6680

PROJECT DESCRIPTION:
This Project entails renewal of the existing operation of Rho-Chem Limited Liability Corporation (Rho-Chem) Hazardous Waste Facility Permit with a proposed roll-off bin storage area (unit).
Rho-Chem routinely stores and treats its halogenated and non-halogenated waste solvents more than 90 days. The Nine (9) units that are being permitted or will be proposed are as follows:

(1) Five (5) container storage/treatment units (Four existing Units, designated as Areas A, F, G, and J, and one proposed roll-off bin storage area, Area H Unit). The existing maximum container storage capacity is 1,410 55-gallon drums or equivalent to 77,550 gallons. The proposed permit will be allowed to store 1,630 55-gallon or 89,650 gallons wastes. A drum crushing/size reduction unit in the Area A is used to reduce volume and consolidate waste materials and damaged drums before shipping to other permitted cement kiln, incineration facility, recycler, or land disposal site. Consolidation operation in the open-top drums or roll-off bins in the Area A is used for subsequent transportation of wastes. Solidification operation in the Area A is used for the wastes suitable for landfill in drums or roll-off bins which are sealed and transported to other permitted land disposal facility.

(2) One existing tank storage/treatment unit (10 carbon steel tanks of each tank with 8,000-gallon design capacity, including six (6) storage tanks and four (4) storage/treatment tanks: Tank numbers (Nos.) 33, 36, 37, 40, 41, and 42 are storage tanks. Tank Nos. 34, 35, 38, and 39 are used to blend and store the solvent wastes with a treatment capacity of 8,000 gallons per day. All tanks are rigidly secured to the concrete slab, with saddles, j-bars, bolts and/or reinforced concrete and are certified by an independent civil engineer to current seismic standards.

(3) Three (3) existing treatment units [Both Thin Film Evaporator (TFE) Unit and Batch Distillation (BD) Unit are in Area E, and a Fractionation Column (FC) Unit in Area C]. The TFE is used to distillation of waste solvents with a maximum design capacity of 750 gallons per hour (equivalent to 18,000 gallons per day). The FC column with the maximum design capacity of 300 gallons per hour (7,200 gallons per day) is used to increase the purity of previously distilled solvents and to separate water from solvent and to separate water-white solvent and aqueous solutions. The wastes are pumped to the re-boiler (tank No. 68) to heat up through a heat exchanger. The BD unit consists of a glass 35-gallon capacity re-boiler, a 4-foot tall packed column, a glass condenser, and a 35-gallon receiver which is used to reclaim certain high value solvents. Wastes solvents are fed directly from the container into the BD unit and are circulated through a heat exchanger.

Rho-Chem recycles spent solvents which are brought into the facility and transferred into aboveground tanks, redistilled, and resold. These spent solvents may be a mixture of a wide range of halogenated, oxygenated, aromatic and aliphatic solvents. Residues from the distillation process are sent off-site for appropriate disposal. Rho-Chem Corporation, a subsidiary of Philip Services Corporation, is the owner and operator of the site. The facility is located at 425 Isis Avenue in the City of Inglewood, County of Los Angeles.

ENVIRONMENTAL IMPACT ANALYSIS:

1. Aesthetics

Project Activities Likely to Create an Impact: The project is the renewal of the Hazardous Waste Permit of Rho-Chem Corporation, which includes the following permitted hazardous waste management activities:

1. RECEIVING SPENT SOLVENTS THROUGH TRUCK TRANSPORT
2. RECYCLING SPENT SOLVENTS
3. STORAGE OF SPENT SOLVENTS
4. REDISTILLATION
5. RESOLD/TRANSFER OFF-SITE
6. DRUM CRUSHING
7. FUEL BLENDING

Description of Baseline Environmental Conditions: There are no scenic resources that currently exist in and around the project site. The Rho-Chem facility exists within an area that is zoned “light industrial” or M-1. The facility operates 24 hours a day, 7 days a week. The lighting used at night for exterior illumination meets the criteria of the City of Inglewood for night illumination within areas zoned “light industrial,” therefore no further analysis is deemed necessary.

Analysis as to whether or not project activities would: N/A

a. Have a substantial adverse effect on a scenic vista.

Impact Analysis:

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☐ No Impact

b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings and historic buildings within a state scenic highway.

Impact Analysis:

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☐ No Impact

c. Substantially degrade the existing visual character or quality of the site and its surroundings.

Impact Analysis:

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☐ No Impact

d. Create a new source of substantial light of glare that would adversely affect day or nighttime views in the area.

Impact Analysis:

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☐ No Impact

References Used:

2. Agricultural Resources

Project Activities Likely to Create an Impact: The project is the renewal of the Hazardous Waste Permit of Rho-Chem Corporation, which includes the following permitted hazardous waste management activities:

1. RECEIVING SPENT SOLVENTS THROUGH TRUCK TRANSPORT
2. RECYCLING SPENT SOLVENTS
3. STORAGE OF SPENT SOLVENTS
4. REDISTILLATION
5. RESOLD/TRANSFER OFF-SITE
6. DRUM CRUSHING
7. FUEL BLENDING

Description of Baseline Environmental Conditions: The facility is located in a predominantly industrial area which is characterized by concrete tilt-up buildings and asphalt- or concrete-paved parking lots and roads. The site is designated as a light industrial area as M-1 pursuant to the City of Inglewood Land Use Planning Map and there will be no conversion of usage associated with the proposed project. There is no local agriculture at all. Therefore, the proposed project will not conflict with existing zoning or agriculture use, or Williamson Act contract, or involve other changes in the existing environment which, due to their location or nature, could result in conversion of farmland, to non-agricultural uses. The project is the permit renewal for the Rho-Chem facility, the facility is located in an area of the City of Inglewood which is zoned “light industrial”. No farmland will be impacted, therefore, no further analysis is deemed necessary.

Analysis as to whether or not project activities would: N/A

a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.

   Impact Analysis:

   Conclusion:
   ☐ Potentially Significant Impact
   ☐ Potentially Significant Unless Mitigated
   ☐ Less Than Significant Impact
   ☐ No Impact

b. Conflict with existing zoning or agriculture use, or Williamson Act contract.

   Impact Analysis:

   Conclusion:
   ☐ Potentially Significant Impact
   ☐ Potentially Significant Unless Mitigated
   ☐ Less Than Significant Impact
   ☐ No Impact

c. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural uses.

   Impact Analysis:

   Conclusion:
   ☐ Potentially Significant Impact
   ☐ Potentially Significant Unless Mitigated
   ☐ Less Than Significant Impact
   ☐ No Impact

References Used:

3. Air Quality

Project Activities Likely to Create an Impact: The project is the renewal of the Hazardous Waste Permit of Rho-Chem Corporation, which includes the following permitted hazardous waste management activities:

1. RECEIVING SPENT SOLVENTS THROUGH TRUCK TRANSPORT
2. RECYCLING SPENT SOLVENTS
3. STORAGE OF SPENT SOLVENTS
4. REDISTILLATION
5. RESOLD/TRANSFER OFF-SITE
6. DRUM CRUSHING
7. FUEL BLENDING

Description of Baseline Environmental Conditions*:* The proposed project is located in the South Coast Air Basin (SCAB), a 6,600 square mile area. The basin is an area of high air pollution potential and is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). SCAB is designated a non-attainment area for federal and state standards for ozone, fine particulate matter (PM10), carbon monoxide (CO), and nitrogen dioxides (NO2). The Facility performs its normal operations under a SCAQMD permit. Permitted hazardous waste activities are not a source of air contaminants. Due to either the small quantities of organic materials in the hazardous waste or the low vapor pressures, the potential for emissions from the hazardous wastes are small. Additionally the wastes are stored in closed tanks or closed containers. The Site is located in the SCAB, an area of relatively mild, semi-arid climate. The annual average temperature is about 63 degrees Fahrenheit (ºF) with a mean daily maximum temperature of 98ºF and a mean daily minimum temperature of 39ºF. Prevailing winds are relatively light to moderate breezes from both the easterly and westerly directions. The South Coast Air Quality Management District (SCAQMD) monitors air quality in Los Angeles, Orange and Riverside Counties and has adopted an Air Quality Management Plan (AQMP) to reduce air pollution to healthful levels. The state of California and the federal government have established ambient air quality standards, or criteria, for outdoor air pollutants in order to protect public health. Currently, the SCAB is considered in non-attainment status of state and federal standards for ozone and PM_{10}.

Air quality permit that apply to the proposed project include: SCAQMD Rule 203 (Permit to Operate). Rho-Chem has 1 SCAQMD Permit to Operate: Vapor Control System

Analysis as to whether or not project activities would:

Air quality impacts are determined according to the criteria set by the federal, state and local pollution standards. The short term impacts on the air pollutants (i.e., ozone, carbon monoxide, nitrogen dioxide, sulfur dioxide, and PM10) from the fugitive dust and construction equipment due to construction activities have been analyzed. The unmitigated construction emissions are estimated to be lower than the suggested SCAQMD criteria. With implementation of dust suppression measures, PM10 would be further reduced by 50 percent.

A Vapor Control System (VCS) permit is granted by SCAQMD for the control of emissions from Rho-Chem hazardous waste management operation. Field personnel will observe and supervise the operation of the VCS system and perform periodic field monitoring/screening to assure that SCAQMD emission requirements are met. The VCS system exhaust will have emission controls meeting best available control technology (BACT) requirements (to be specified in the SCAQMD permit).

A summary of federal and state air quality standards is provided in Table 1 and potential health effects are shown in Table 2. The U.S. Environmental Protection Agency established national ambient air quality standards pursuant to adoption of federal Clean Air Act. The California Air Resources Board (CARB) establishes state air quality standards under the mandate of the Mulford-Carrell Act. Currently, federal and state standards for ozone, carbon monoxide, nitrogen dioxide, and suspended particulates are often exceeded in the Basin. The SCAQMD monitors criteria pollutant levels at various stations within the Basin. As shown in Table 3, criteria pollutant levels near the project site are based on data from the Southwestern Los Angeles County monitoring station (located approximately ten miles from site). The air quality impacts are determined according to the criteria set on the federal, state and local pollution standards/regulations. Impacts would be considered significant if the proposed project emissions met any of the following criteria:

1. The proposed project would be capable of an increase in daily emissions that exceed the following SCAQMD suggested threshold criteria:

Pollutant	Threshold criteria (lbs/day)

ROG	55
CO	550
NOx	55
SOx	150
PM10	150

2. Proposed project emissions would increase ambient pollutant levels from below the KNACKS/CACAOS to above these table standards.
3. Proposed project would be not consistent with the 1991 Air Management Plan (AMP).
4. Proposed project would exceed the provision of significant deterioration (PSD) pollutant increment.

Air pollutant emissions and/or ambient concentration increments from existing, project related and cumulative sources that could potentially impact sensitive receptors within the project area or its vicinity have been estimated. The air quality impact was evaluated on the short term impacts due to construction activity, long term impacts due to project operation, and conformity with the AMP. The air emission calculation work-sheets are presented in Tables 3, 4 and 5.

It is estimated that an average 300 square feet of foundation would be done within four weeks after the Roll-off bin storage area (ROB) work plan is approved by DTSC. This square footage was averaged over two (2) working days to estimate a maximum daily construction rate of 150 square feet. SCAQMD emission factors were then utilized to estimate emissions of air pollutants during these construction activities. The estimated construction emissions are provided in the following table.

Unmitigated Construction Emission Estimates (lbs/day)

Pollutant Activities	ROG	CO	Nox	SOx	PM10
Fugitive Dust	13.3	195.2	42.4	1.7	22.04
Construction Equipment	0.6	2.2	10.5	0.6	0.6
Total Emissions	13.9	197.4	52.9	2.3	22.64
Suggested SCAQMD Criteria	55	550	55	150	150
Exceed Threshold Criteria	No	No	No	No	No

Fugitive dust impacts might temporary result from the project concrete demolition activities. Specifically, particulates would be emitted by the engines of demolition and hauling equipment, and dust would be generated from soil excavation and back-filling. Use of water or other soil stabilizers which would be used to control fugitive dust, as required by SCAQMD Rule 403, can reduce emissions by a minimum of 50 percent. Using the SCAQMD emission factors and data furnished by the project proponent, PM10 emissions were calculated for the construction phase of the project. Assuming an average of 300 square feet for 2 days of development, total PM10 emissions from construction activities would be 22.64 pounds per day per Table 1.

With implementation of the dust suppression measures which are proposed in the ROB Workplan, PM10 would be reduced by 50 percent, to approximately 11.3 pounds per day. These calculated data do not exceed the suggested SCAQMD criteria for particulates of 150 pounds per day. Therefore, PM10 emissions that would be generated from implementation of the proposed project would not result in significant impact on air quality. Based on the information provided by the facility and the subsequent air quality analysis done by DTSC, the remedy selected activities will not significantly affect the air quality of the area. This project will not conflict with or obstruct implementation of the applicable air quality plan or violate any air quality standard or contribute substantially to an existing or projected air quality violation. This project will not result in cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors). This project will not expose sensitive receptors to substantial pollutant concentrations. This project will not create objectionable odors affecting a substantial number of people. This project did not involve in the removal of old building constructed before 1950 and the site is not located at any asbestos mine site lists, therefore, this project will not result in human exposure to Naturally Occurring Asbestos (see also Geology and Soils, f.).

Table 1. Federal and State Ambient Air Standards

Pollutant	Averaging Time	Federal Standard	California Standard
Ozone	1 Hour	0.12 ppm	0.09 ppm
Carbon	1 Hour	35.0 ppm	20.0 ppm
Monoxide	8 Hours	9.0 ppm	9.0 ppm
Nitrogen	1 Hour	---	0.25 ppm

Dioxide	Annual	0.05 ppm	---
Sulfur	1 Hour	---	0.5 ppm
Dioxide	24 Hours Annual	0.14 ppm 0.03 ppm	0.05 ppm ---
PM10	24 Hours Annual	150 µg/m3 50 µg/m3	50 µg/m3 30 µg/m3

ppm: Parts per million; µg/m3: Micrograms per cubic meter ; Source: South Coast Air Quality Management District, 1993.

Table 2. Air Pollutants Summary:

Air Pollutant	Source	Health Effects
Ozone	Photochemical reaction between other pollutants	General respiratory irritation and Discomfort
Carbon Monoxide	Incomplete fuel combustion	Interference with normal oxygen transfer to the blood; oxygen deprivation
Nitrogen Oxides	Combustion	Respiratory irritation
Sulfur Dioxide Particulates	Combustion of fuels containing industrial, transportation, agriculture, construction activities	Upper respiratory irritation; lung tissue injury; adverse effects on respiratory system

Source: Bay Area Air Quality Management District (November 1985)

Table 3. Summary Air Pollutant Data from Southwest Coastal LA County Monitoring Station (2000-2002)

Pollutant	SCAQMD Station Data		
	2000	2001	2002
CO:			
Max. Conc.(ppm) 1 hour	9	7	7
Max. Conc.(ppm) 8 hours	7	5.14	6.1
8-hours > 9.5 ppm (F)	0	0	2
8-hours > 9.0 ppm (S)	0	0	0
Ozone:			
Max. Conc.(ppm) 1-hour	0.10	0.098	0.088
Max. Conc.(ppm) 8-hour	0.075	0.08	0.073
1-hours > 0.12 ppm (F)	0	0	0
1-hours > 0.09 ppm (S)	1	0	0
NOx			
Max. Conc.(ppm) 1-hour	0.13	0.11	0.10*
Max. Conc.(ppm) 24-hour	0.027	0 .08	NM
Days > 0.25 ppm (S)	0	NM	0
Average	0.0275	0.025	0.024
Sox			
Max. Conc.(ppm) 1-hour	0.01	0.04	0.07
Max. Conc.(ppm) 24-hour	0	0.012	0.007
Days > 0.05 ppm	NM	NM	NM
PM10			
Max. Conc.(µg/m3) 24 hrs	74	75	121
Annual Average	33.41	34.4	34
Days > 150 µg/m3 (F)	0	0	0
Days > 50 µg/m3 (S)	9	8	12

NM: Not measured; µg/m3: Micrograms per cubic meter; ppm: Parts per million;
F: Federal Standards; S: State Standards. *: Less than 12 full months of data.
(Source: SCAQMD Annual Monitoring Reports, 2000-2002)

Table 4. Construction Equipment Emissions (Using Future Land Use to Calculate, April 1993 CEQA Handbook, Table A9-3)

Land Use	Annual	Daily	Total	
			Annual	Daily
Sq. Footage	**300**	**150**	**300**	**150**
P.C.E.E.*	22,046	22,046		
FxG(BTU*1E6)	6.6	3.3		
H:				
ROG (#/BTU*1E6)	0.2	0.2		
CO (#/BTU*1E6)	0.7	0.7		
NOx (#/BTU*1E6)	3.4	3.4		
SOx (#/BTU*1E6)	0.2	0.2		
PM10 (#/BTU*1E6)	0.2	0.2		
E:				
ROG (#)	4.2	0.6	4.2	0.6
CO (#)	14.6	2.2	14.6	2.2
NOx (#)	71.1	10.5	71.1	10.5
SOx (#)	4.2	0.6	4.2	0.6
PM10 (#)	4.2	0.6	4.2	0.6

***** P.C.E.E.: Project Construction-related Exhaust Emissions, includes construction equipment and worker's travel exhaust emissions, and truck exhaust emissions, from table A9-3-H.
ROG: Reactive Organic Gases

Table 5. Estimating PM10 Emissions from Fugitive Dust:

1. Trucks/Paved Parking Lots with Street Cleaning:
Assuming one internal transportation trucks will be used in the parking lots moving in and out, and the parking space for each car will be 10 feet (width) by 30 feet (length). The PM10 emissions will be 0.12 pounds per day.

E = 0.003 gms/vehicle x 1 x (10+30) = 0.12 (Table A9-9 of SCAQMD CEQA Hand Books 1993)

2. Debris Pushing:
Assuming one Front-end loader is operating 1 hour/day, and the emission rate of 21.8 pounds, lbs/hour per loader results 21.8 pounds per day of PM10.

E = 21.8 (lbs/hour) x 1 (No. of Bulldozers) x 1 (Hour of Operation per Day) = 21.8 pounds per day.

3. Truck Filling or Storage:
Assuming 12 cubic yards of export/import, and 12 cubic yards per trip, and assuming that each cubic yard weights 1,000 pounds or 0.5 ton:

12 x 0.5 = 6 ton/day of demo debris.
6 x 0.02205 lbs/ton = 0.12 lbs/day of PM10 from truck filling or storage.

Total PM10 Emissions from construction work, including construction equipment:

Et = 0.12 + 21.8 + 0.12 = 22.04 lbs/day
22.04 pounds per day. < 150 lbs/day SCAQMD suggested threshold criteria.

Ref:
a. RCRA Part B Permit Renewal for Rho-Chem Facility, November, 2004
b. Current Condition Report, Rho-Chem Facility, Geomatrix Consultants, Inc., (GMX) February 7, 2003 (Page 27-29)

a. Conflict with or obstruct implementation of the applicable air quality plan.

Impact Analysis:
The applicable air quality plan for the project area is the 1997 Air Quality Management Plan (AQMP) prepared by the SCAQMD. An AQMP describes air pollution control strategies to be taken by a city/county or region classified as a non-attainment area. The main purpose of an AQMP is to bring the area into compliance with the requirements of Federal and State air quality standards. The California Environmental Quality Act (CEQA) requires that certain

proposed projects be analyzed for consistency with the AQMP. For a project to be consistent with the AQMP, the pollutants emitted from the project should not exceed the SCAQMD daily threshold or cause a significant impact on air quality. However, if feasible mitigation measures are implemented and shown to reduce the impact level from significant to less than significant, the project is deemed consistent with the AQMP.

The AQMP uses the assumptions and projections of local planning agencies to determine control strategies for regional compliance status. Since the AQMP is based on local General Plans, projects that are deemed consistent with the General Plan are usually found to be consistent with the AQMP. The proposed project is consistent with City of Inglewood and Los Angeles County's General Plan. Since the project is merely the renewal of an existing hazardous wastes permit, no significant impacts will result.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation.

Impact Analysis:
The proposed project is the renewal of an existing hazardous waste permit. There are approximately 10 -15 trucks that visit the facility daily to either pick up finished products or deliver raw materials. There are approximately 10-15 trucks per week that visit the facility to haul hazardous wastes. The proposed project is consistent with City of Inglewood and Los Angeles County's General Plan. The facility is in compliance with the applicable air quality standard of the district as set forth in subsection (a). Since the project is merely the renewal of an existing hazardous waste permit, no significant impacts will result.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

c. Result in cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).

Impact Analysis:
Please see response to subsection (a).

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

d. Expose sensitive receptors to substantial pollutant concentrations.

Impact Analysis:
The proposed permit renewal project is to continue operation of the existing facility with a proposed roll-off bin storage area for solid waste storage where is located in the existing paved tank farm area which will not result in exposure by sensitive receptors to substantial pollutant concentrations. There are no existing or proposed schools within one-quarter mile of the facility.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

e. Create objectionable odors affecting a substantial number of people.

Impact Analysis:
The permit renewal project with the existing SCAQMD permitted vapor control system is not anticipated that there will be any objectionable odors affecting a substantial number of people.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

f. Result in human exposure to Naturally Occurring Asbestos (see also Geology and Soils, f.).

Impact Analysis:
There are no sources of naturally occurring asbestos in the project area. Therefore, the project will not result in human exposure to naturally occurring asbestos.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used:

a. SCAQMD Permits to Operate-Vapor Control System, Permit No. F60549,May 13, 2003.
b. Current Condition Report, Rho-Chem Facility, Geomatrix Consultants, Inc., (GMX) February 7, 2003
c. CEQA Initial Study Workbook, DTSC, April 2004
d. CEQA Air Quality Handbook, SCAQMD, April 1993

4. Biological Resources

Project Activities Likely to Create an Impact:
The project is the renewal of the Hazardous Waste Permit of Rho-Chem Corporation, which includes the following permitted hazardous waste management activities:

1. RECEIVING SPENT SOLVENTS THROUGH TRUCK TRANSPORT
2. RECYCLING SPENT SOLVENTS
3. STORAGE OF SPENT SOLVENTS
4. REDISTILLATION
5. RESOLD/TRANSFER OFF-SITE
6. DRUM CRUSHING
7. FUEL BLENDING

Description of Baseline Environmental Conditions: The site is located in a predominantly industrial area of the City of Inglewood in County of Los Angeles, is characterized by large stucco/steel building and surrounding areas of asphalt-or concrete-paved parking and access roads. There is a very low potential for the site to support sensitive biological resources because of improvements which is paved or a building and location in the industrialized area.

The Current Condition Report (CCR) of the Rho-Chem Facility indicates that the search of the National Environmental Policy Act (NEPA) database reveals that there are no potentially environmentally sensitive areas such as marshlands, wetlands, streams, forests, or oceans, wilderness areas, wildlife preserves, wetlands, or 100-year floodplains located within one-mile radius of the site. Review of available information in the California Biodiversity Database revealed two plants, the coastal dunes milk-vetch and the southern tar plant, as endangered species in the general vicinity. However, based on the information provided, the habitat for both plants is the coast dune and wetlands in southern California. This facility, however, is fully paved and is not suitable a habitat for these plants. The last observed occurrences of these plants were in the early 1900s.

The City of Inglewood General Plan Update Technical Background Report (Inglewood Report), dated August 2006, indicated special-status biological resources include plant and wildlife species that have been afforded special status and/or recognition by federal and state resource agencies, as well as private conservation organizations and special interest groups such as the California Native Plant Society (CNPS) (List 1A, 1B, and 2). In general, the principal reason an individual taxon (species, subspecies, or variety) is given such recognition is the documented or expected decline or limitation of its population size or geographical extent and/or distribution that results in most cases, from habitat loss. Special status habitats are vegetation types, associations, or sub-associations that support concentrations of special status plant or wildlife species, are of relatively limited distribution, or are of particular value to wildlife.

The Inglewood Report indicated that the South Coast marsh vole, Coastal dunes milk-vetch, Southern tarplant, Coulter's goldfield, and Spreading navarretia (federally/state listed threatened or endangered species) were identified as (moderately) potentially occurring on-site or reported within an approximately ten-mile radius of the City of Inglewood.

Although review of the Natural Diversity Database reveals several records of sensitive species, most of these are believed to be extirpated or no longer existing within the area due to the level of development in the City. CCR field studies verified the absence of these sensitive species within the facility limits.

Analysis as to whether or not project activities would:

a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.

   Impact Analysis:
   The project will not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. The project will not conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. The project will not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

   No impacts to biological resources are expected as a result of the implementation of the project because the surrounding area is fully developed. Moreover, the proposed project will affect only a few hundred square feet of the facility which is itself fully paved. Therefore, the project will not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species, on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game, or U.S. Fish and Wildlife Service. Also, as noted in the Environmental Setting, biological data searches were conducted at both the federal and state level, no habitats or species of concern

were identified as being located in or around the facility site, therefore, it has been determined that no impacts to sensitive plant and/or animal species will occur as a result of the permit renewal.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.

Impact Analysis:
Please see the response in subsection (a).

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

Impact Analysis:
The project will not have any impact on plant life in general, or rare and unique plant life or those ecological communities dependent on such plant life. There will not be any adverse effect on listed, threatened, and endangered plants, on species of plants listed as protected or identified for special management in the Fish and Game Code, the Public Resources Code, the Water Code, or regulations adopted there under, nor on marine and terrestrial plant species subject to the jurisdiction of the Department of Fish and Game or the ecological communities in which they reside. The project will not have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

Impact Analysis:
The site is located within an intensively developed urban area in southeastern Los Angeles County. As such, neither the site nor nearby areas serve as a wildlife dispersal corridor. No significant impacts to wildlife dispersion will occur as a result of project implementation.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

e. Conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

Impact Analysis:

As indicated above, the site is located in an intensively developed urban area and does not contain any natural vegetation. In particular, no locally designated natural communities exist on the subject property and no impacts are anticipated.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Impact Analysis:
No other Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan applies to the Site. Please also see response to subsection (a).

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used:

a. RCRA Part B Permit Renewal, Rho-Chem Facility, Rho-Chem Corporation, March 28, 2008
b. Current Condition Report, Rho-Chem Facility, Geomatrix Consultants, Inc.(GMX), February 7, 2003
c. The City of Inglewood General Plan Update Technical Background Report, August 2006

5. Cultural Resources

Project Activities Likely to Create an Impact: The project is the renewal of the Hazardous Waste Permit of Rho-Chem Corporation, which includes the following permitted hazardous waste management activities:

1. RECEIVING SPENT SOLVENTS THROUGH TRUCK TRANSPORT
2. RECYCLING SPENT SOLVENTS
3. STORAGE OF SPENT SOLVENTS
4. REDISTILLATION
5. RESOLD/TRANSFER OFF-SITE
6. DRUM CRUSHING
7. FUEL BLENDING

Description of Baseline Environmental Conditions:
The facility has been previously graded and covered in asphalt and concrete. The proposed project will affect only a few hundred square feet of the facility which is already covered by concrete. It is located in a primarily industrial area.

No known unique ethnic cultural values or cultural resources have been observed by the project manager or have otherwise been reported at the facility. There are no bedrock exposures on-site and the fluvial nature of the underlying geological materials obviates the likelihood of any paleontological resources. The Rho-Chem facility exists within an area that is zoned “light industrial.”

There are no reported unique ethnic cultural values, archeological resources or cultural/paleontological resources at the facility. The site is not on the historical properties/ buildings list pursuant to Office of Historic Preservation, and the site is not on the archeological resources list pursuant to electronic information provided through the California Native American Heritage Commission and Office of Historic Preservation. Neither have the project manager and other inspectors observed such during site visits or during past excavation and removal of underground tanks. The site is designated and zoned for light industrial use as M-1. This proposed project will not cause an adverse change on a significance of a historical resources or archeological resource as defined in 15064.5. The site lies within the ancestral lands of the Gabrielino/Tongva which stretch from Topanga Canyon in Los Angeles County through Aliso Creek in Orange County. The facility does not lie on or near any reported sites of sacred importance to the Gabrielenos. Importantly, the location has extensive previous disturbance due to some 30 or more underground tanks being removed. No further excavation of any part of the site is proposed as part of this project. The project involves a permit renewal with minor construction of a proposed roll-off bin storage area that will be converted from the existing paved product tank farm area. Therefore, no further analysis is deemed necessary.

Analysis as to whether or not project activities would: N/A

a. Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5.

   Impact Analysis:

   Conclusion:
   ☐ Potentially Significant Impact
   ☐ Potentially Significant Unless Mitigated
   ☐ Less Than Significant Impact
   ☐ No Impact

b. Cause a substantial adverse change in the significance of an archeological resource pursuant to 15064.5.

   Impact Analysis:

   Conclusion:
   ☐ Potentially Significant Impact
   ☐ Potentially Significant Unless Mitigated
   ☐ Less Than Significant Impact
   ☐ No Impact

c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

   Impact Analysis:

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☐ No Impact

d. Disturb any human remains, including those interred outside of formal cemeteries.

Impact Analysis:

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☐ No Impact

References Used:

a. Health and Safety Code 7050.5: http://www.leginfo.ca.gov/calaw.html
b. California Native American Heritage Commission: http://www.ceres.ca.gov/nahc/cr.html [contact person is Rob Wood]
c. Current Condition Report, Rho-Chem Facility, Geomatrix Consultants, Inc.(GMX), February 7, 2003,
d. Office of Historic Preservation http://ohp.parks.ca.gov.
e. Gabrieleno/Tongva sacred sites http://www.Tongva.com.

6. Geology and Soils

Project Activities Likely to Create an Impact: The project is the renewal of the Hazardous Waste Permit of Rho-Chem Corporation, which includes the following permitted hazardous waste management activities:

1. RECEIVING SPENT SOLVENTS THROUGH TRUCK TRANSPORT
2. RECYCLING SPENT SOLVENTS
3. STORAGE OF SPENT SOLVENTS
4. REDISTILLATION
5. RESOLD/TRANSFER OFF-SITE
6. DRUM CRUSHING
7. FUEL BLENDING

Description of Baseline Environmental Conditions:
The Rho-Chem facility is located in Section 32, Township 2 South, Range 14 West, San Bernardino Base and Meridian within the City of Inglewood, County of Los Angeles, California. Topographic map coverage of the site vicinity is provided by the U.S. Geological Survey, Inglewood and Venice, California Quadrangle 7.5 minute series (1954, 1964, and photo-revised in 1981). A copy of the modified Inglewood and Venice topographic quadrangle portraying the site location is provided in Figure 1.

The Rho-Chem Current Condition Report indicates that the elevation of the site is approximately 100 feet above mean sea level with a local topographic gradient of flat and slopes gently to the southeast. The site does not lie within 100-year flood plain. In addition, there are no waterways or wetlands within one-mile radius of the facility.

The site is located in the West Coast Basin (also referred to as West Basin). The basin is bounded by the Newport-Inglewood Fault Zone (Newport-Inglewood Uplift) to the east, the Ballona Gap and Santa Monica Mountains to the north, Santa Monica Bay to the west, and Palos Verdes Hills and San Pedro Bay to the south (DWR, 1961). Major geologic features in the area include the Charnock Fault, the Gardena Syncline, and the Newport-Inglewood Fault Zones. These features trend from northwest to southeast in the basin.

The Charnock Fault is located approximately one-half mile to the southwest of the site. The Gardena Syncline, a basin-wide structure, underlies the site, and Newport-Inglewood Fault is located approximately one mile east of the site. The geologic formation materials in this portion of the West Basin consist of approximately 600 feet of alluvial deposits of Pleistocene-aged San Pedro and Pico Formations.

In the vicinity of the site, the surface geology and geological materials to a depth of approximately 150 feet below ground surface (bgs) consist of the undifferentiated alluvium of the Lakewood Formation and are underlain by the Gage aquifer (Lakewood Formation) from a depth of approximately 150 to 200 feet bgs. The Lakewood Formation is underlain by the San Pedro Formation, an undifferentiated alluvium from approximately 200 to 300 feet bgs. The Lynwood aquifer is at the depth of approximately 300 to 325 feet bgs, and the Silverado Aquifer is from a depth of approximately 400 to 600 feet bgs.

The water-bearing series consists of poorly sorted, permeable unconsolidated deposits of Quaternary (Pleistocene to Holocene) age, and are classified as the Recent alluvium, the Older alluvium and the Saugus formation. Thickness of the water-bearing series is range from zero next to the flanks of the surrounding mountains and hills to over 1,000 feet in the central and western portions of the valley.

In the vicinity of Rho-Chem, the total thickness of the geologic units within the water bearing series is approximately 1,000 feet. The gravel, sand and clay deposits are poorly sorted and form lenses that are laterally discontinuous. It is difficult to differentiate between the three geologic units.

The water-bearing geologic units tend to act as one aquifer that is semi-confined. The base of the western basin is underlain by relatively impervious sedimentary rocks of Tertiary Cretaceous age.

Site specific lithologic information from on-site borings indicate that the site is immediately underlain by fluvial deposits which consist of a heterogeneous mixture of silty and sandy clays with inter-bedded fine-to medium-grained sands. The fine-grained units extend from the ground surface to a depth of approximately 189 feet (the depth of exploration). Four general zones were reported based on the lithologic logs developed during drilling and sampling conducted in 1991.

Zone 1 ranges from ground surface to approximately 35 to 40 feet bgs and is comprised of inter-bedded silty sands, silts, clayey sands, and clays.

Zone 2 ranges from a depth of approximately 40 to 65 feet bgs and is characterized by a silty clay of relatively consistent thickness across the facility.

Zone 3 extends from approximately 65 feet to 145 feet bgs and is characterized by silty sands, sands, and gravely sands in approximately equal proportions with minor silt and clay lenses. Groundwater occurs in this zone at depths of 100 feet bgs and greater.

Zone 4 extends from approximately 145 to 189 feet bgs and is characterized by coarse gravely sands with large cobbles. Historical well logs for the area suggest that a thick, clay-dominated layer forms the base of this zone at approximately 200 to 210 feet bgs. This fine-grained zone is also interpreted to occur at a depth of approximately 200 feet bgs at the site.

Analysis as to whether or not project activities would:

a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

- Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault. (Refer to Division of Mines and Geology Special Publication 42).
- Strong seismic ground shaking.
- Seismic-related ground failure, including liquefaction.
- Landslides.

Impact Analysis:
The proposed project will not involve the building at all. The separation of roll-off bib storage area will be constructed outside and is not expected to cause any exposure to people or structures due to the effects of surface rupture, shaking, ground failure, or landslides. The Facility's site is level and ground water is at 95 feet bgs, which obviates landslides and liquefaction issues.

No fault is known to cross the facility, therefore, the project is unlikely to be affected by surface rupture. Strong seismic shaking is always a possibility in the LA basin, however, the proposed project is unlikely to expose people or structures to loss, injury, etc., as a result of such shaking.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

b. Result in substantial soil erosion or the loss of topsoil.

Impact Analysis:
The proposed project will not result in unstable earth conditions or any changes to the underlying geological materials, topography, or ground surface. Extensive excavation has previously occurred across portions of the facility; however, no further excavation is anticipated except the construction of the foundation pad of approximately 300 square feet for the RFB storage area at the northwestern of the facility which was concrete paved. Therefore, no significant impacts are expected to the building foundations or the underlying soil structure from project activities. Therefore, no soil erosion or the loss of topsoil is expected at all.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.

Impact Analysis:
The Facility is paved, there will be no exposure of surface soil and neither wind or water erosion of soil, can result, on-site or off-site. The Facility is approximately 5 miles west of the Pacific Ocean and this proposed project will not affect deposition or erosion of beach sands. See also response to subsection (a).

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property.

Impact Analysis:
The Facility was reinforced and upgraded to meet requisite building code standards in 1995 and the main building is not expected to expose people or property to geologic hazards such as earthquakes, landslides, mudslides, or ground failure. No major fault is known to cross the Facility, therefore, create substantial risks to life or property.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of water.

Impact Analysis:
Because there will be no exposure of soils, neither siltation, deposition, or erosion will occur which may cause modification of a channel of a river or stream or the bed of the ocean or any bay, inlet or lake. In addition, it should be noted that the nearest surface drainage is Ballona Creek, a concrete-lined channel which is located approximately 4.5 miles northwest of the Facility. The Facility is connected to a sewer and therefore the proposed project will not involve the use of septic tanks or alternative waste water disposal systems.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

f. Be located in an area containing naturally occurring asbestos (see also Air Quality, f.).

Impact Analysis:
There is not any naturally occurring asbestos in the region.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used:

1. Current Condition Report, Rho-Chem Facility, Geomatrix Consultants, Inc., (GMX) February 7, 2003
2. Underground Storage Tank Removal Report, Rho-Chem Facility, GMX, February 13, 2003

7. Hazards and Hazardous Materials

Project Activities Likely to Create an Impact: The project is the renewal of the Hazardous Waste Permit of Rho-Chem Corporation, which includes the following permitted hazardous waste management activities:

1. RECEIVING SPENT SOLVENTS THROUGH TRUCK TRANSPORT
2. RECYCLING SPENT SOLVENTS
3. STORAGE OF SPENT SOLVENTS
4. REDISTILLATION
5. RESOLD/TRANSFER OFF-SITE
6. DRUM CRUSHING
7. FUEL BLENDING

Description of Baseline Environmental Conditions:
Rho-Chem recycles spent solvents which are brought into the facility and transferred into aboveground tanks, redistilled, and resold. These spent solvents may be a mixture of a wide range of halogenated, oxygenated, aromatic and aliphatic solvents. These waste streams include alkaline solutions with metals, drum or tank sludges/residues generated on-site, aqueous solution with metals, total organic residues, off specification, aged, or surplus inorganic chemical compounds, catalysts, solvent wastes contain tetrachloroethene (PCE); trichloroethene (TCE), 1,1,1- trichloroethane (TCA); methylene chloride; toluene; cis-1,2-dichloroethene (cis 1,2 DCE); 1,1-dichloroethene (1,1-DCE) ; xylenes or carbon tetrachloride (CT).

The Rho-Chem facility is currently operating as a solvent recycler and distributor. It is located in a commercial/manufacturing area.

Analysis as to whether or not project activities would:

a. Create a significant hazard to the public or the environment throughout the routine transport, use or disposal of hazardous materials.

   Impact Analysis:
   A major transportation artery, Manchester Boulevard, is located within ½ block and links to the 405 Freeway within 1 mile of the Facility. There are only three residences within ¼ mile, and these are primarily used for businesses. There are limited health hazards or safety risks that could potentially impact the surrounding community due to hazardous material or waste discharge. The health and safety training and monitoring plans will prevent or limit the hazardous material or waste discharged into the environment. The potential exposure of the public to any of the hazardous wastes on-site is negligible as the wastes are in tanks or containers that are within a secure facility. The potential for exposures during transport are also negligible as the wastes are packaged as required by DOT regulations and transported by a permitted company familiar with transporting hazardous waste.

   Conclusion:
   ☐ Potentially Significant Impact
   ☐ Potentially Significant Unless Mitigated
   ☐ Less Than Significant Impact
   ☒ No Impact

b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

   Impact Analysis:
   The potential for a release to the environment is minimized by storing hazardous wastes in tanks with secondary containment and containers in secondary containment. Tanks and the associated secondary containment are inspected daily.

   There are two levels of response to potential or actual releases of hazardous waste under the facility procedures. Members of the general employee population are trained to recognize potential or actual releases and to move to safety, evacuate the area if necessary and to provide notification to the Inglewood Emergency Response Line. The procedures to be followed and the training requirements for all employees are in the Emergency Action plan.

   The facility has security 24/7 which patrols the facility and is trained to recognize and report any potential or actual releases of hazardous waste. Emergency contact information for the members of the Hazardous Materials Team is included in the Spill Response Plan.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school.

Impact Analysis:
Emissions of hazardous wastes from the permitted activities at the facility are negligible because wastes are stored in covered tanks or covered containers, the vapor pressures of the chemicals in the waste are generally low and the wastes are not heated or handled in a manner that causes aerosols. There is no existing or proposed school within one-quarter mile of the facility site.

None of the permitted wastes are acutely hazardous materials.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to public or the environment.

Impact Analysis:
The Site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would not create a significant hazard to public or the environment.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

e. Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.

Impact Analysis:
The implementation of the contingency plan at the site will control or minimize the damage if spill or fire occurred. The Facility is also connected with the private, local, and state emergency response groups within short time periods (approximately 15 to 30 minutes response time) to minimize any potential impacts from the hazards.
Only one roll-off bin solid waste storage area is proposed to add to the existing permit are being proposed. **T**he project will not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

References Used:

a. RCRA Part B Permit Renewal, Rho-Chem Facility, Rho-Chem Corporation, March 28, 2008
b. Current Condition Report, Rho-Chem Facility, Geomatrix Consultants, Inc.(GMX), February 7, 2003
c. The City of Inglewood General Plan Update Technical Background Report, August 2006

8. Hydrology and Water Quality

Project Activities Likely to Create an Impact: The project is the renewal of the Hazardous Waste Permit of Rho-Chem Corporation, which includes the following permitted hazardous waste management activities:

1. RECEIVING SPENT SOLVENTS THROUGH TRUCK TRANSPORT
2. RECYCLING SPENT SOLVENTS
3. STORAGE OF SPENT SOLVENTS
4. REDISTILLATION
5. RESOLD/TRANSFER OFF-SITE
6. DRUM CRUSHING
7. FUEL BLENDING

Description of Baseline Environmental Conditions: The Facility is located in the northeastern portion of the West Coast Groundwater Basin (also referred to as West Basin). The 160 square-mile basin is bounded by the Newport-Inglewood Fault Zone (Newport-Inglewood Uplift) to the east, the Ballona Gap and Santa Monica Mountains to the north, Santa Monica Bay to the west, and Palos Verdes Hills and San Pedro Bay to the south (DWR, 1961).

Major geologic features in the area include the Charnock Fault, the Gardena Syncline, and the Newport-Inglewood Fault Zones. These features trend from northwest to southeast in the basin. The Charnock Fault is located approximately one-half mile to the southwest of the site. The Gardena Syncline, a basin-wide structure, underlies the site, and Newport-Inglewood Fault is located approximately one mile east of the site. The geologic formation materials in this portion of the West Basin consist of approximately 600 to 1000 feet of alluvial deposits of Pleistocene-aged San Pedro and Lakewood Formation, which contain the primary drinking water aquifers.

The depths and thickness of these aquifers vary across the basin. The major aquifers of concern from the oldest to the youngest (deep to shallow) are: Silverado, Lynwood, and Gage Aquifers. Most of these aquifers are separated by regionally extensive aquitards or low permeability units. However, areas within two mile radius of the Rho-Chem site where all of these aquifers merge are hydraulically connected. (Rho-Chem Operation Plan, November 2004).

The Facility is underlain by alluvial deposits of silt, fine sands, and clay to a depth of 50' feet as reported by J.H. Kleinfelder & Association. The depth of groundwater occurred at approximately 100 feet below ground surface (bgs). In the vicinity of the Facility, the Lakewood Formation is known to contain undifferentiated Quaternary deposits, the Bellflower Aquiclude and Gage Aquifer.

The undifferentiated Quaternary deposits extended from the ground surface to a depth of approximately 100 feet bgs. This unit is composed of a heterogeneous mixture of fine-grained continental, marine, and wind-blown sediments. The Bellflower Aquiclude underlies the undifferentiated Quaternary deposits, and is approximately 40-50 feet thick in the site vicinity. The Gage aquifer is the basal member of the Lakewood Formation. Regional water level information from the West Coast Groundwater Basin. indicates that the Bellflower unit is the uppermost water bearing unit and contains small quantities of ground water.

The San Pedro Formation contains the Lynwood and Silverado which are the primary drinking water aquifers in the vicinity of the site. The Lynwood Aquifer underlies the Gage Aquifer at a depth of 50 feet thick. The Lynwood Aquifer is separated from the Gage Aquifer by a lower permeability unit which is 50 to100 feet thick. The Silverado Aquifer underlies the Lynwood Aquifer at a depth of approximately 400 feet, and is roughly 200 feet in thickness in the vicinity of the site.

Surface Water

There are no surface waters within one mile of the site. The nearest surface water body appears to be the Centinela Park Reservoir located approximately 2 mile to the northeast. Surface water run-off at the Facility is collected by storm drain catch basins on-site and either treated on-site or directed to off-site storm water drains. According to information obtained from the state of California Department of Water resources, two inactive wells exist within one mile of the Facility. There are no known drinking-water wells within one mile radius of the site. (OP, February 6, 1996)

Analysis as to whether or not project activities would:

a. Violate any water quality standards or waste discharge requirements.

Impact Analysis:
Any wastewater generated at the site will be collected and send off-site for further treatment and disposal and therefore will not be discharge as part of the proposed project. Therefore, project generated waste water will not violate any water quality standards or waste discharge requirements.

Conclusion:
☐ Potentially Significant Impact

☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficient in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted).

Impact Analysis:
The Rho-Chem facility does not use groundwater in the operation of its business. Further, the facility is completely paved and has been since 1953, when the facility was opened. Moreover, the area is zoned light industrial, and as such is nearly completely covered with impervious paving, preventing local groundwater recharge.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on or off-site.

Impact Analysis:
The drainage pattern at the Rho-Chem facility has been unchanged since 1953, when the site was paved. There was no pre-existing stream or river on the site when it was first developed. In the interim since 1958, storm drains have been installed by the County to facilitate removal of storm water runoff from the facility.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off-site.

Impact Analysis:
The proposed project will not involve nor result in any physical change of any water body, water course, nor wetland nor will it change any currents, courses of direction of water movement, in either marine or fresh water, alter the flow of flood waters or expose people to water-related hazards. There is no riparian land, rivers, streams, water courses, or wet-lands under state or federal jurisdiction at or near the Facility. Further, since the proposed project does not include any grading, no alterations of any surface water bodies, etc. would be possible in any event.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

e. Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff.

Impact Analysis:
Please see responses to subsections (c) and (d).

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

f. Otherwise substantially degrade water quality.

Impact Analysis:
The proposed project will involve the conversion of approximately 300 square feet area concrete pad for the ROB storage area on the existing concrete of the northwestern corner of the site. This will not result in alterations to the course or flow of flood waters. No discharge is proposed as part of this project, therefore, it will not result in a discharge into surface waters, or in any alteration of surface water quality, including but not limited to, temperature, dissolved oxygen or turbidity. Similarly, no project-generated waste water will be discharged to the ground water; therefore, the project generated waste water will not violate any water quality standards or waste discharge requirements for ground water. Moreover, since groundwater extraction is not part of the proposed project, it will not substantially deplete groundwater supplies.

On-site generated wastewater will be analyzed and sent off-site for proper treatment or disposal. No discharge of waste waters will be made to any marine or fresh waters. On-site surface run-off, a.k.a. non-industrial waste water (rainwater), is currently discharged to the storm drain collection systems, and flowed west into Ballona Creek where in turn is discharged into the Pacific Ocean which is approximately 5 miles northwest of the site. The proposed project does not include any grading or paving and therefore will not result in changes in absorption rates, drainage patterns, or the rate, interfere with groundwater recharge, and amount of surface run-off.

All of the permitted hazardous waste storage and treatment units are contained within approved secondary containments, which are monitored weekly. Therefore, there will be no degradation of water quality due to hazardous waste activities.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

g. Place within a 100-flood hazard area structures which would impede or redirect flood flows.

Impact Analysis:
The Facility is not located within a 100-year or 500-year flood plain, is not near any topographic expression, is not near any surface water bodies, is 5 miles from the ocean, and is at an elevation of 200 feet above mean sea level, none of the flooding, seiching, mudflow, or tsunami-related concerns are applicable. No modifications to the existing permit are being proposed.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

h. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam.

Impact Analysis:
The Rho-Chem facility is not located near a dam or levee. See also response to subsection (g).

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

i. Inundation by sieche, tsunami or mudflow.

Impact Analysis:
The Rho-Chem facility is 5 miles from the Pacific Ocean, It is unlikely that a sieche or tsunami would reach the facility. The facility is located in flat terrain with no nearby source of material to sustain a mudflow. Therefore, the proposed project will not be subject inundation by sieche, tsunami or mudflow.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used:

a. RCRA Part B Permit Renewal, Rho-Chem Facility, Rho-Chem Corporation, March 28, 2008
b. Current Condition Report, Rho-Chem Facility, Geomatrix Consultants, Inc.(GMX), February 7, 2003
c. The City of Inglewood General Plan Update Technical Background Report, August 2006

9. Land Use and Planning

Project Activities Likely to Create an Impact: The project is the renewal of the Hazardous Waste Permit of Rho-Chem Corporation, which includes the following permitted hazardous waste management activities:

1. RECEIVING SPENT SOLVENTS THROUGH TRUCK TRANSPORT
2. RECYCLING SPENT SOLVENTS
3. STORAGE OF SPENT SOLVENTS
4. REDISTILLATION
5. RESOLD/TRANSFER OFF-SITE
6. DRUM CRUSHING
7. FUEL BLENDING

Description of Baseline Environmental Conditions:
The site is located in the City of Inglewood which is part of the metropolitan area of Los Angeles County. The City of Inglewood Urban Water Management Plan, dated December 31, 1995, indicates that in 1995 the population in the city is estimated of approximately 114,583 people. The city does not currently have published projections regarding the estimated population by the year 2010.

The site is designated or zoned as M-1, which is industrial. The site is located south of Manchester Avenue. Land use in the vicinity of the site is zoned for industrial and commercial purposes. Based on the existing conditional use permit, the Facility is compatible with existing zoning both for it and surrounding area. Therefore, no further analysis is deemed necessary.

Analysis as to whether or not project activities would: N/A

a. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.

   Impact Analysis:

   Conclusion:
   ☐ Potentially Significant Impact
   ☐ Potentially Significant Unless Mitigated
   ☐ Less Than Significant Impact
   ☐ No Impact

b. Conflict with any applicable habitat conservation plan or natural community conservation plan.

   Impact Analysis:

   Conclusion:
   ☐ Potentially Significant Impact
   ☐ Potentially Significant Unless Mitigated
   ☐ Less Than Significant Impact
   ☐ No Impact

References Used:

a. RCRA Part B Permit Renewal, Rho-Chem Facility, Rho-Chem Corporation, March 28, 2008
b. Current Condition Report, Rho-Chem Facility, Geomatrix Consultants, Inc.(GMX), February 7, 2003
c. The City of Inglewood General Plan Update Technical Background Report, August 2006

10. Mineral Resources

Project Activities Likely to Create an Impact: The project is the renewal of the Hazardous Waste Permit of Rho-Chem Corporation, which includes the following permitted hazardous waste management activities:

1. RECEIVING SPENT SOLVENTS THROUGH TRUCK TRANSPORT
2. RECYCLING SPENT SOLVENTS
3. STORAGE OF SPENT SOLVENTS
4. REDISTILLATION
5. RESOLD/TRANSFER OFF-SITE
6. DRUM CRUSHING
7. FUEL BLENDING

Description of Baseline Environmental Conditions:
The Facility is located in an industrial area which is characterized by large industrial buildings and paved parking lots and roads. Neither this Facility nor the surrounding area are currently used for the extraction or used of mineral resources, therefore no further analysis is deemed necessary.

Analysis as to whether or not project activities would: N/A

a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.

   Impact Analysis:

   Conclusion:
   ☐ Potentially Significant Impact
   ☐ Potentially Significant Unless Mitigated
   ☐ Less Than Significant Impact
   ☐ No Impact

b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

   Impact Analysis:

   Conclusion:
   ☐ Potentially Significant Impact
   ☐ Potentially Significant Unless Mitigated
   ☐ Less Than Significant Impact
   ☐ No Impact

References Used:

a. RCRA Part B Permit Renewal, Rho-Chem Facility, Rho-Chem Corporation, March 28, 2008
b. Current Condition Report, Rho-Chem Facility, Geomatrix Consultants, Inc.(GMX), February 7, 2003
c. The City of Inglewood General Plan Update Technical Background Report, August 2006

11. Noise

Project Activities Likely to Create an Impact: The project is the renewal of the Hazardous Waste Permit of Rho-Chem Corporation, which includes the following permitted hazardous waste management activities:

1. RECEIVING SPENT SOLVENTS THROUGH TRUCK TRANSPORT
2. RECYCLING SPENT SOLVENTS
3. STORAGE OF SPENT SOLVENTS
4. REDISTILLATION
5. RESOLD/TRANSFER OFF-SITE
6. DRUM CRUSHING
7. FUEL BLENDING

Description of Baseline Environmental Conditions:
Rho-Chem is located within an area that is zoned industrial. The applicable noise standard set by the City of Inglewood for industrial businesses is 75 dBA , 24 hours per day.

Analysis as to whether or not project activities would:

a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

Impact Analysis:
As noted, Rho-Chem is located within an area that is zoned industrial. The proposed project is the permit renewal of existing operation of the facility which recycles spent solvents transferred to the site and into aboveground tanks. The solvents are redistilled and resold. The proposed permit renewal includes the conversion of an approximately 300 square foot area concrete pad to be used as additional storage. No other modifications are proposed. The permit renewal will not exceed the noise standard established by the City of Inglewood, therefore no impact to noise.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

b. Exposure of persons to or generation of excessive groundbourne vibration or groundbourne noise levels.

Impact Analysis:
As noted in subsection (a), no other modifications to facility operations are proposed as part of this permit renewal, the proposed project will not result in any groundbourne vibration.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

c. A substantial permanent increase in ambient noise levels in the vicinity above levels existing without the project.

Impact Analysis:
Please see responses to subsections (a) and (b).

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.

Impact Analysis:

Please see responses to subsections (a) and (b).

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used:

a. RCRA Part B Permit Renewal, Rho-Chem Facility, Rho-Chem Corporation, March 28, 2008
b. Current Condition Report, Rho-Chem Facility, Geomatrix Consultants, Inc.(GMX), February 7, 2003
c. The City of Inglewood General Plan Update Technical Background Report, August 2006

12. Population and Housing

Project Activities Likely to Create an Impact: The project is the renewal of the Hazardous Waste Permit of Rho-Chem Corporation, which includes the following permitted hazardous waste management activities:

1. RECEIVING SPENT SOLVENTS THROUGH TRUCK TRANSPORT
2. RECYCLING SPENT SOLVENTS
3. STORAGE OF SPENT SOLVENTS
4. REDISTILLATION
5. RESOLD/TRANSFER OFF-SITE
6. DRUM CRUSHING
7. FUEL BLENDING

Description of Baseline Environmental Conditions:
The Facility is located in an area designated for industrial use. There is no construction, conversion or demolition of buildings, either homes or commercial/industrial, associated with the proposed project. The proposed project will not require any additional permanent workers at the Facility. Therefore, this project will not affect existing housing, public services, infrastructure, or creates demands for additional housing. Therefore, no further analysis is deemed necessary.

Analysis as to whether or not project activities would: N/A

a. Induce substantial population growth in area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).

Impact Analysis:
Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☐ No Impact

b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere.

Impact Analysis:
Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☐ No Impact

c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

Impact Analysis:
Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☐ No Impact

References Used:

13. Public Services

Project Activities Likely to Create an Impact: The project is the renewal of the Hazardous Waste Permit of Rho-Chem Corporation, which includes the following permitted hazardous waste management activities:

1. RECEIVING SPENT SOLVENTS THROUGH TRUCK TRANSPORT
2. RECYCLING SPENT SOLVENTS
3. STORAGE OF SPENT SOLVENTS
4. REDISTILLATION
5. RESOLD/TRANSFER OFF-SITE
6. DRUM CRUSHING
7. FUEL BLENDING

Description of Baseline Environmental Conditions:
Emergency Services are provided by the City of Inglewood Police Department and the Los Angeles County Fire Department. The nearest police station is the City of Inglewood Police Department Station, located approximately two miles northeast of the Facility on Manchester Avenue. Response to a structural fire is provided by fire station number 171, whose emergency response time would be approximately four to five minutes. The nearest hospital is Centinela Hospital Medical Center which is located within approximately five miles from the Facility. The hospital has an approximate cumulative capacity of 370 beds. The closest four-year college, University of West Los Angeles, is approximately 0.25 miles to the south of the facility. The Northrop Rice Aviation Institute of Technology is located on the same campus. Non-hazardous municipal waste generated in City of Inglewood is collected by three private haulers, Waste Management, B.F.I. and Crown Disposal. The only anticipated hazardous wastes are carbon granules that may be used to capture gas-phase contaminants and condensate recovered from knockout pots which are part of the SVE system. These will be managed either at the Facility or by transportation to an independent off-site treatment or disposal vendor.

Analysis as to whether or not project activities would:

a. Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:

   - Fire protection
   - Police protection
   - Schools
   - Parks
   - Other public facilities

   Impact Analysis:
   The project would allow continued treatment and storage of hazardous waste and approval of proposed roll-off bin solid hazardous waste management unit at the existing facility. The project does not require any increase in the existing public services provided by the Cities of Inglewood. No additional staff is needed to manage the project. Hence, the project will not contribute to increase in demand for public services. Therefore, the project will not have impact on public services at the area, and thus no additional analysis is required.

   Conclusion:
   ☐ Potentially Significant Impact
   ☐ Potentially Significant Unless Mitigated
   ☐ Less Than Significant Impact
   ☒ No Impact

References Used:

a. RCRA Part B Permit Renewal, Rho-Chem Facility, Rho-Chem Corporation, March 28, 2008
b. Current Condition Report, Rho-Chem Facility, Geomatrix Consultants, Inc.(GMX), February 7, 2003
c. The City of Inglewood General Plan Update Technical Background Report, August 2006

14. Recreation

Project Activities Likely to Create an Impact: The project is the renewal of the Hazardous Waste Permit of Rho-Chem Corporation, which includes the following permitted hazardous waste management activities:

1. RECEIVING SPENT SOLVENTS THROUGH TRUCK TRANSPORT
2. RECYCLING SPENT SOLVENTS
3. STORAGE OF SPENT SOLVENTS
4. REDISTILLATION
5. RESOLD/TRANSFER OFF-SITE
6. DRUM CRUSHING
7. FUEL BLENDING

Description of Baseline Environmental Conditions:
The Facility is located in the City of Inglewood in a metropolitan area of Los Angeles County. In 2005 the population in the city is estimated of approximately 118,164 people [City of Inglewood General Plan Update, Technical Background Report, dated August 2006]. There are no recreational sites nearby the Facility. The Rho-Chem facility has operated on this site since 1953, no recreational uses apply to this propose project, therefore no further analysis is deemed necessary.

Analysis as to whether or not project activities would: N/A

a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

   Impact Analysis:

   Conclusion:
   ☐ Potentially Significant Impact
   ☐ Potentially Significant Unless Mitigated
   ☐ Less Than Significant Impact
   ☐ No Impact

b. Include recreational facilities or require construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

   Impact Analysis:

   Conclusion:
   ☐ Potentially Significant Impact
   ☐ Potentially Significant Unless Mitigated
   ☐ Less Than Significant Impact
   ☐ No Impact

References Used:

a. RCRA Part B Permit Renewal, Rho-Chem Facility, Rho-Chem Corporation, March 28, 2008
b. Current Condition Report, Rho-Chem Facility, Geomatrix Consultants, Inc.(GMX), February 7, 2003
c. The City of Inglewood General Plan Update Technical Background Report, August 2006

15. Transportation and Traffic

Project Activities Likely to Create an Impact: The project is the renewal of the Hazardous Waste Permit of Rho-Chem Corporation, which includes the following permitted hazardous waste management activities:

1. RECEIVING SPENT SOLVENTS THROUGH TRUCK TRANSPORT
2. RECYCLING SPENT SOLVENTS
3. STORAGE OF SPENT SOLVENTS
4. REDISTILLATION
5. RESOLD/TRANSFER OFF-SITE
6. DRUM CRUSHING
7. FUEL BLENDING

Description of Baseline Environmental Conditions:
Regional access to the Facility is provided by the eight-lane "I-405" San Diego Freeway and four-lane Manchester Avenue. Primary local access is from Manchester Avenue via Isis Avenue. Isis Avenue is a two-lane, north-south street with traffic signal at the intersection with Manchester Avenue. Manchester Avenue is a four-lane main east-west thoroughfare, approximately 3/4 mile west of the San Diego Freeway, and serves industrial and commercial areas in the City of Inglewood. Aviation Avenue runs parallel to and one block to the west of Isis Avenue. It is a four-lane thoroughfare. Traffic flow is heavy on both Aviation and Manchester Avenues. A twenty-four hour car count was performed in 2000, on Manchester Avenue between Aviation Avenue and La Cienega Boulevard. This is the nearest and most recent volume measurement to the Rho-chem facility. The average 24-hour total traffic flow volume was 32,200 vehicles. Data are not available for Isis Avenue, however, the Inglewood Department of Public Works estimates that the average 24-hour daily traffic flow volume on Isis Avenue near Manchester Avenue is approximately 2,000 to 3,000 vehicles.

Analysis as to whether or not project activities would:

a. Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections).

   Impact Analysis:
   As noted, the proposed project is a permit renewal to the exiting permit. There are approximately 10-15 trucks that visit the facility daily to either pick up finished products or deliver raw materials. The proposed project operates consistent with the City of Inglewood's General Plan, prepared in 1990. The general plan was updated on the section of infrastructure in 1995, revised the house section in 2005, and currently update all seven sections in the plan.

   As noted, the proposed permit renewal includes the conversion of an approximately 300 square foot area concrete pad to be used as additional storage area. However, the conversion is estimated to take approximately four weeks to complete, therefore any increase in truck traffic due to this conversion will be minor and will not exceed the established level of service on Isis Avenue. No other modifications are proposed.

   Conclusion:
   ☐ Potentially Significant Impact
   ☐ Potentially Significant Unless Mitigated
   ☐ Less Than Significant Impact
   ☒ No Impact

b. Exceed, either individually or cumulatively, a level of service standard established by the country congestion management agency for designated roads or highway.

   Impact Analysis:
   As noted in the Environmental Setting, the Inglewood Department of Public Works estimated that the average 24-hour daily traffic flow volume on Isis Avenue near Manchester Avenue is approximately 2,000 to 3,000 vehicles.
   The proposed permit renewal will not exceed, either individually or cumulatively, a level of service standard established by the country congestion management agency for designated roads or highway. Please also see response to subsection (a).

   Conclusion:
   ☐ Potentially Significant Impact
   ☐ Potentially Significant Unless Mitigated
   ☐ Less Than Significant Impact
   ☒ No Impact

c. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

Impact Analysis:
See responses in subsections (a) and (b).

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

d. Result in inadequate emergency access.

Impact Analysis:
See responses in subsections (a) and (b).

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

e. Result in inadequate parking capacity.

Impact Analysis:
See responses in subsections (a) and (b).

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

f. Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks).

Impact Analysis:
As noted in the Land Use Planning section, the facility is operating in an area zoned “light industrial,” and there are no known alternative transportation plans for the City of Inglewood. Therefore the proposed project will be consistent with established plans consistent with the permit for this facility’s operations and zoning for this area of Inglewood**.**

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used:

a. RCRA Part B Permit Renewal, Rho-Chem Facility, Rho-Chem Corporation, March 28, 2008
b. Current Condition Report, Rho-Chem Facility, Geomatrix Consultants, Inc.(GMX), February 7, 2003
c. The City of Inglewood General Plan Update Technical Background Report, August 2006

16. Utilities and Service Systems

Project Activities Likely to Create an Impact: The project is the renewal of the Hazardous Waste Permit of Rho-Chem Corporation, which includes the following permitted hazardous waste management activities:

1. RECEIVING SPENT SOLVENTS THROUGH TRUCK TRANSPORT
2. RECYCLING SPENT SOLVENTS
3. STORAGE OF SPENT SOLVENTS
4. REDISTILLATION
5. RESOLD/TRANSFER OFF-SITE
6. DRUM CRUSHING
7. FUEL BLENDING

Description of Baseline Environmental Conditions:
The City of Inglewood provides water and power to Rho-Chem Facility. Southern California Edison (SCE) supplied electrical energy to City of Inglewood. The water provided by the City of Inglewood is pumped from City-owned wells, treated, and blended with water purchased from the West Basin Municipal Water District (WBMWD). The Los Angeles County Sanitation District (LACSD) manages wastewater collection and treatment for the City of Inglewood. The wastewater from the City primarily flows to the Joint Water Pollution Control Plant located in the City of Carson.

Rho-Chem facility has a storm water discharge permit granted by the Los Angeles Regional Water Quality Control Board and a wastewater discharge permit for the boiler blow-out water from LACSD.

Analysis as to whether or not project activities would:

a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.

Impact Analysis:
The project would allow continued treatment and storage of hazardous waste and approval of proposed roll-off bin solid hazardous waste management unit at the existing facility. As noted in the Environmental Setting, the LACSD manages wastewater collection and treatment for the City of Inglewood including Rho-Chem Corporation. Additionally, the Facility was granted a storm water discharge permit by the LACSD and operates in full compliance with the applicable requirements. The project does not increase any water or wastewater treatment requirements of the applicable Regional Water Quality Control Board. Hence, the project will not exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

Impact Analysis:
The project would allow continued treatment and storage of hazardous waste and approval of proposed roll-off bin solid hazardous waste management unit at the existing facility. The project does not increase any water or wastewater treatment requirements of the applicable Regional Water Quality Control Board. Therefore, the project will not require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Please also see response to subsection (a).

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

Impact Analysis:

The project would allow continued treatment and storage of hazardous waste and approval of proposed roll-off bin solid hazardous waste management unit at the existing facility. The project does not require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Please also see response to subsection (a).

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed.

Impact Analysis:
The project would allow continued treatment and storage of hazardous waste and approval of proposed roll-off bin solid hazardous waste management unit at the existing facility. The project has sufficient water supplies available to serve the project from existing entitlements and resources, no new or expanded entitlements needed.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

e. Result in determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the projects projected demand in addition to the providers existing commitments.

Impact Analysis:
The project would allow continued treatment and storage of hazardous waste and approval of proposed roll-off bin solid hazardous waste management unit at the existing facility. The project does not increase any water or wastewater treatment requirements of the applicable Regional Water Quality Control Board. Therefore, the project will not result in determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the projects projected demand in addition to the providers existing commitments.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

f. Be served by a landfill with sufficient permitted capacity to accommodate the projects solid waste disposal needs.

Impact Analysis:
The project would allow continued treatment and storage of hazardous waste and approval of proposed roll-off bin solid hazardous waste management unit at the existing facility. Three hazardous waste landfills, US Ecology in Beatty, Nevada; Waste Management Inc. in Kettleman, California; Azusa Land Reclamation in California are used by Rho-Chem for disposal of hazardous wastes. These facilities with sufficient permitted capacity to accommodate the projects solid waste disposal needs. The Rho-Chem generated solid wastes (Non-hazardous wastes) are sent to the Agua Mansa Landfill Facility in Riverside, California for disposal.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

g. Comply with federal, state, and local statutes and regulations related to solid waste.

Impact Analysis:
The project would allow continued treatment and storage of hazardous waste and approval of proposed roll-off bin solid waste management unit at the existing facility. One of the permit conditions is to comply with all federal, state, and local related statutes, regulations, ordinances, and other special permit conditions. The project must comply with federal, state, and local statutes and regulations related to solid waste.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used:

a. RCRA Part B Permit Renewal, Rho-Chem Facility, Rho-Chem Corporation, March 28, 2008
b. Current Condition Report, Rho-Chem Facility, Geomatrix Consultants, Inc.(GMX), February 7, 2003
c. The City of Inglewood General Plan Update Technical Background Report, August 2006

Mandatory Findings of Significance

Based on evidence provided in this Initial Study, DTSC makes the following findings:

a. The project ☐ has ☒ does not have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory.

b. The project ☐ has ☒ does not have impacts that are individually limited but cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

c. The project ☐ has ☒ does not have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly.

Determination of Appropriate Environmental Document:

Based on evidence provided in this Initial Study, DTSC makes the following determination:

☒ The proposed project COULD NOT HAVE a significant effect on the environment. A **Negative Declaration** will be prepared.

☐ The proposed project COULD HAVE a significant effect on the environment. However, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A **Mitigated Negative Declaration** will be prepared.

☐ The proposed project MAY HAVE a significant effect on the environment. An **Environmental Impact Report** is required.

☐ The proposed project MAY HAVE a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An **Environmental Impact Report** is required, but it must analyze only the effects that remain to be addressed.

☐ The proposed project COULD HAVE a significant effect on the environment. However, all potentially significant effects (a) have been analyzed adequately in an earlier Environmental Impact Report or Negative Declaration pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier Environmental Impact Report or Negative Declaration, including revisions or mitigation measures that are imposed upon the proposed project. Therefore, nothing further is required.

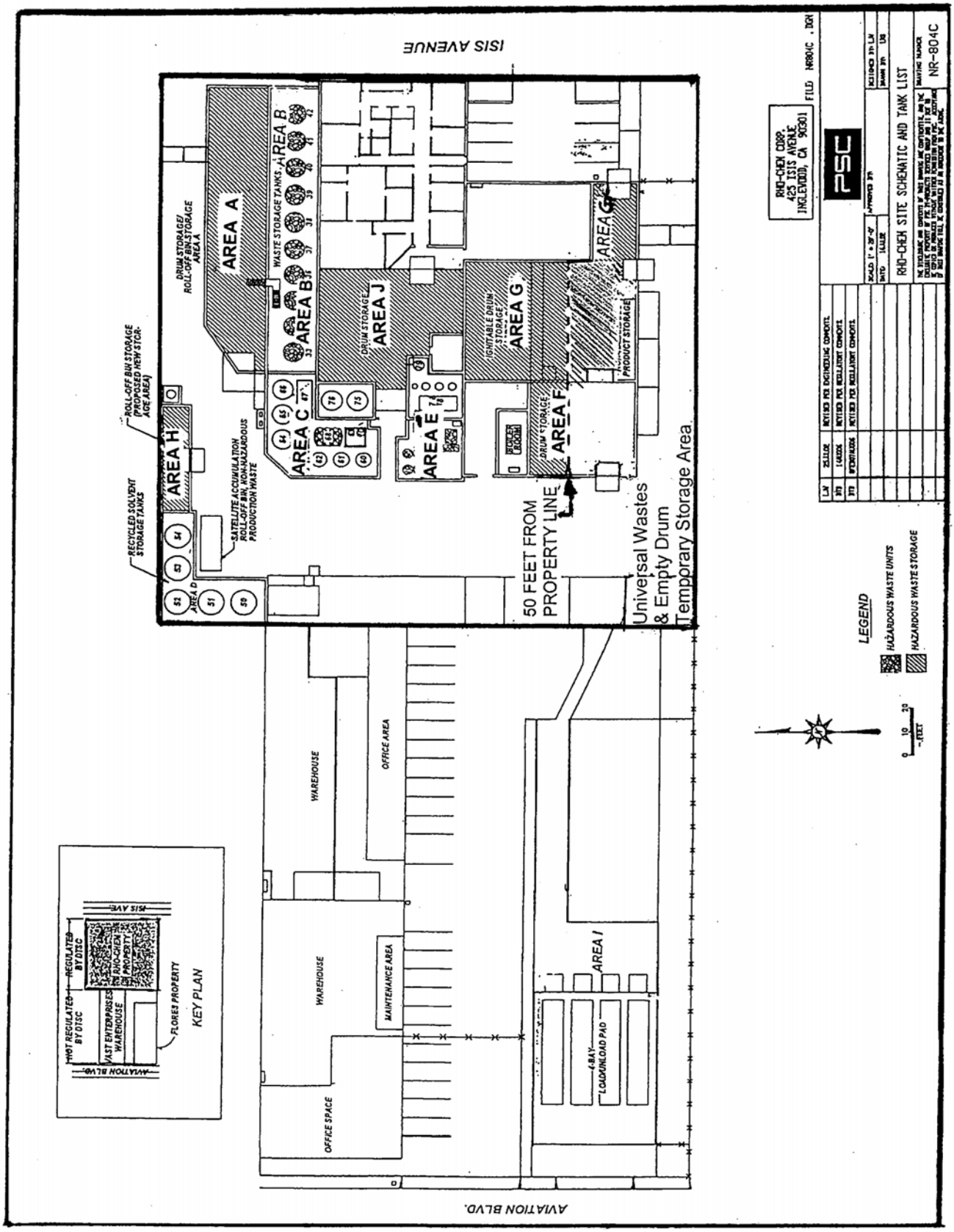
Certification:

I hereby certify that the statements furnished above and in the attached exhibits, present the data and information required for this initial study evaluation to the best of my ability and that the facts, statements and information presented are true and correct to the best of my knowledge and belief.

		March 28, 2008
Preparer's Signature		Date
Liang Chiang, P.E.	Hazardous Substances Engineer	(818) 717-6680
Preparer's Name	Preparer's Title	Phone #
Branch or Unit Chief Signature		Date
Raymond Leclerc, P.E.	Permit Renewal Team Leader	(916) 2 55-3582
Branch or Unit Chief Name	Branch or Unit Chief Title	Phone #

ATTACHEMENT A-1 Facility Location Map

ATTACHEMENT A-2 Facility Site Map



ATTACHEMENT B

REFERENCES

1. The City of Inglewood General Plan Update Technical Background Report, August 2006
2. RCRA Part B Permit Renewal, Rho-Chem Corporation, April 2007.
3. SCAQMD Permits to Operate-Rho-Chem Corporation Vapor Control System, May 13, 2003.
4. Current Condition Report, Rho-Chem Facility, Geomatrix Consultants, Inc., February 7, 2003
5. Underground Storage Tank Removal Report, Rho-Chem Facility, GMX, February 13, 2003
6. Urban Water Management Plan, City of Inglewood, December 31, 1995.
7. Health and Safety Code 7050.5: http://www.leginfo.ca.gov/calaw.html
8. California Native American Heritage Commission: http://www.ceres.ca.gov/nahc/cr.html [contact person is Rob Wood]
9. Office of Historic Preservation http://ohp.parks.ca.gov.
10. Gabrieleno/Tongva sacred sites http://www.Tongva.com.